

Serial No. 10/808,567

Attorney Docket No. 01-583

**REMARKS**

Claims 1-19 are pending. The applicants respectfully request reconsideration and allowance of this application in view of the above amendments and the following remarks.

The title was said to be non-descriptive and a new title was required. The title has been amended to be more descriptive.

Claim 1 has been amended to remove the words "two of a." This change removes unnecessary wording and does not change the substance of the claim. In other words, this change is for clarification.

Claims 1-3, 5, 6 and 18 were rejected under 35 USC 102(e) as being anticipated by Teshima *et al.* The applicants respectfully request that this rejection be withdrawn for the following reasons.

Part e) of the office action indicates that the Teshima *et al.* reference discloses a "conductive layer" 3 formed on the insulating layer 15. However, the coupler 3, or "conductive layer" is not formed on the insulating layer as claimed in claim 1. There is no resin 15 located beneath the coupler 3 in the apparatus of Teshima *et al.* Note that the resin material 15 is located only between the molded resin 9 and certain surfaces of the parts, but none of the resin material 15 is located such that the coupler 3 is "on" the resin material 15. Therefore, this rejection should be withdrawn.

Also, part e) of the office action indicates that the coupler 3 or "insulating layer" is electrically connected with the control electrode and electrically connected with an input portion protruding from the mold resin member. However, there is nothing in Teshima *et al.* to show that an electrical connection exists between the coupler 3 and the control electrode 7. While solder 4 exists between the switching element 1 and the coupler 3, the solder 4 is for conducting

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heat. There is no disclosure that the solder 4 makes an electrical connection with the switching element 1. Therefore, this rejection should be withdrawn.

Claims 2, 3, 5, 6, and 18 depend on claim 1, directly or indirectly. Therefore, claims 2, 3, 5, 6, and 18 are considered to be patentably distinct over the Teshima *et al.* reference for the reasons given above with respect to claim 1.

Claims 4, 7, 13 and 14 were said to be allowable if written in independent form. Claims 4, 7 and 13 have been written in independent form including the limitations of claim 1. Therefore, claims 4, 7, 13 and 14 are considered to be in condition for allowance.

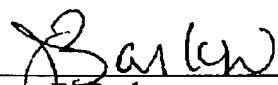
Claim 19 is new. Claim 19 depends on claim 1 and is thus considered to be patentable for the reasons given above. Claim 19 is readable on the elected species.

Rejoinder of the withdrawn claims under 37 CFR 1.141 is respectfully requested.

In view of the foregoing, the applicants submit that this application is in condition for allowance. A timely notice to that effect is respectfully requested. If questions relating to patentability remain, the examiner is invited to contact the undersigned by telephone.

If there are any problems with the payment of fees, please charge any underpayments and credit any overpayments to Deposit Account No. 50-1147.

Respectfully submitted,

  
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